

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

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UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 22 CR

22-CR-29

[Title 18, U.S.C. §§ 1344
and 2(a)]

MICHAEL W. HARVEY and
SHANIKA V. HARVEY,

Defendants.

INDICTMENT

THE GRAND JURY CHARGES THAT:

1. Beginning on or about August 10, 2017, and continuing through on or about May 13, 2020, in the State and Eastern District of Wisconsin and elsewhere,

**MICHAEL W. HARVEY and
SHANIKA V. HARVEY,**

with intent to defraud, knowingly devised, participated in, and carried out a scheme to defraud and obtain money by means of false and fraudulent pretenses and representations (the “scheme”), which is described more fully below.

The Scheme

2. The primary objects of the scheme were to: (a) obtain and attempt to obtain money, funds, and other property owned by and under the custody and control of various financial institutions, including but not limited to, BMO Harris Bank, Associated Bank, Chase Bank, Bank First National Bank, U.S. Bank, Fox Community Credit Union, Nicolet National Bank, Johnson Bank, Bay Bank, and Wells Fargo Bank, all of which are insured by the Federal

Deposit Insurance Corporation and the National Credit Union Share Insurance Fund; and (b) enrich the defendants and their co-actors.

Manner and Means of the Scheme to Defraud

3. As part of the scheme and artifice to defraud:
 - a. Defendants travelled through the Eastern District of Wisconsin.
 - b. Defendants forcibly entered mailboxes and stole numerous pieces of mail, containing checks, from businesses and individuals located in the Green Bay and Fox Valley metropolitan areas.
 - c. Defendants altered the checks they stole, thereby creating counterfeit financial instruments.
 - d. Defendants recruited, trained, transported, and paid other persons to cash and negotiate counterfeit financial instruments.
 - e. Defendants shared in the proceeds of the cashed and negotiated counterfeit instruments.
 - f. Defendants, and their co-actors, attempted to cash, and cashed, approximately 39 counterfeit checks, totaling approximately \$63,946.29, at financial institutions in the Eastern District of Wisconsin.
 - g. Michael Harvey fraudulently obtained approximately 49 stolen checks from Green Bay and Fox Valley area businesses and individuals, totaling approximately \$116,405.47.

Executions of Scheme

4. On or about the indicated dates, in the State and Eastern District of Wisconsin,

**MICHAEL W. HARVEY and
SHANIKA V. HARVEY**

knowingly, and with intent to defraud, executed and attempted to execute the scheme by presenting and attempting to negotiate the described fraudulent checks at the indicated financial institutions:

<u>Count</u>	<u>Date</u>	<u>Description of Transaction</u>
One	August 31, 2017	Check number 2175 presented to BMO Harris Bank in the amount of \$2,500.
Two	September 1, 2017	Check number 69255 presented to BMO Harris Bank in the amount of \$2,528.80.
Three	September 1, 2017	Check number 2387 presented to Fox Communities Credit Union in the amount of \$2,585.48.

Each in violation of Title 18, United States Code, Sections 1344(2) and 2(a).

FORFEITURE NOTICE

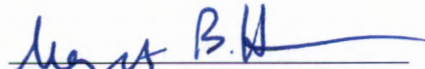
1. Upon conviction of one or more of the bank fraud offenses, in violation of Title 18, United States Code, Section 1344, set forth in Counts One through Four of this Indictment, Defendants Michael W. Harvey and Shanika V. Harvey shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(2)(A), any property constituting, or derived from, proceeds obtained directly or indirectly, from such violation. The property to be forfeited includes, but is not limited to, the following, a sum of money equal to the proceeds derived from the offense.

2. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be subdivided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c).

A TRUE BILL: 


FOREPERSON

Dated: 2/1/2022


for RICHARD G. FROHLING
United States Attorney